

# Exhibit B

Documents filed in the  
State Court Action

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

<b>MOHAMMAD KHOSHNEVISZADEH,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No.</b>
	)	<b>Division</b>
<b>v.</b>	)	
	)	
<b>SAM'S WEST, INC.,</b>	)	
	)	
<b>And</b>	)	
	)	
<b>KEVIN COKELEY,</b>	)	
<b>Defendants.</b>	)	

**PETITION FOR DAMAGES**

COMES NOW, Plaintiff Mohammad Khoshneviszadeh, by and through the undersigned counsel, and for his causes of action against Defendants Sam's West, Inc., (hereinafter, "Sam's", or "Defendant") and Kevin Cokeley, states, alleges and avers as follows:

**GENERAL ALLEGATIONS**

1. Plaintiff is, and at all times pertinent was, a resident of Missouri.
2. Defendant Sam's West, Inc., is an Arkansas corporation doing business at 3500 NE Ralph Powell Road, in Lee's Summit.
3. Defendant may be served through its registered agent, CT Corporation System, 120 South Central Avenue, St. Louis, Missouri, 63105.
4. Defendant Cokeley is and at all times pertinent hereto was, a Missouri resident.

5. Plaintiff started working for WalMart and Sam's Club, in Feb., 2000. He was employed as a pharmacist.

6. Starting in 2006, he moved exclusively to Sam's Club.

7. Plaintiff worked there until his termination in September, 2020.

8. In this time Plaintiff was never disciplined by the company.

9. Plaintiff seldom, if ever had any customer or co-worker complaints.

10. Though Plaintiff worked all over western Missouri and eastern Kansas, he reported to the pharmacy at the Sam's Club at 4100 South Bolger Road, in Independence, Jackson County, Missouri.

11. Plaintiff's regional manager made the decision to fire him. His name is Tim Keehn.

12. Keehn is notorious for yelling at and belittling the staff, including pharmacists.

13. While employed, Plaintiff was earning \$78.00 per hour. In many years, he earned in excess of \$180,000.00.

14. On or about August 14, 2020, Plaintiff became aware that his wife had tested Covid positive. Plaintiff immediately contacted the pharmacy managers and the store manager, and closed the pharmacy, and left work. Plaintiff obtained a Covid test, and tested negative. Plaintiff had no symptoms, and was placed back on the schedule five days after notifying his employer about the exposure.

15. Upon returning to Sam's Club, Plaintiff began undergoing daily temperature tests and screenings. He also checked his temperature throughout the day, every day.

Plaintiff had been told that he could use the application provided to the employees to do this, and he always used the screening entrance when going to work.

16. Plaintiff attempted to use the pharmacy application, but it was not working. He tried several times, and was told that multiple people were having issues with it.

17. Later that night, Plaintiff learned that he did have a temperature. He advised his employer of this condition. He further advised them that it would be imprudent to return to work until his symptoms subsided, and until he had a subsequent test.

18. Shortly thereafter, one of Plaintiff's co-workers— co-Defendant Cokeley— reported Plaintiff to the Board of Pharmacy.

19. Subsequently, Plaintiff was terminated, on September 6, despite doing everything that he was asked to do.

20. Plaintiff's condition affected major life activities when he was ill. Further, he was perceived to have had Covid, and perceived to have had a condition which affected major life activities. His wife's Covid also affected her major life activities, and further people perceived her to have had her major life activities impaired while she was sick.

21. Plaintiff was terminated because of perceived disability, and further being associated with someone— his wife— who is perceived to have a disability.

22. In addition, Plaintiff is over the age of 40, has brown skin, and is of Middle Eastern descent. He was born in Iran and considers himself Persian.

23. Plaintiff believes he was terminated bases of race and my age. Further, he also believes his race and national origin played a role in his termination, as Keehn is white.

24. After Plaintiff's termination, the Board of Pharmacy determined that he did nothing wrong.

25. This action has continued, and the acts described herein are interrelated, as Sam's made false reports to the Board of pharmacy and continued to disparage him after firing him.

26. The discrimination of which Plaintiff complains was not a series of discrete acts, but rather a continuing series of interrelated acts.

27. Shortly after the termination, on or about March 1, 2021, Plaintiff submitted to his employer a service letter, pursuant to Chapter 290.

28. Sam's has never responded.

29. Defendant Sam's, at all times relevant hereto, is and has been an "employer" within the meaning of the Missouri Human Rights Act.

30. The Court, being a court of competent jurisdiction, has original subject matter jurisdiction over all of the Plaintiff's claims.

31. Further, in so far as Defendant Sam's, at all times pertinent hereto, conducted and continues to conduct business in Jackson County, Missouri; the Plaintiff was employed by the Defendant Sam's at its Jackson County, Missouri, location; and the unlawful practices and all other transactions alleged herein were committed in Jackson County, Missouri, venue is proper in Jackson County.

32. After being terminated, Plaintiff filed a timely charge of discrimination, with the Missouri Commission on Human Rights (hereinafter, "MCHR") and the Equal Opportunity Employment Commission (hereinafter, "EEOC"), asserting discrimination based on age, disability, race, color, and national origin. The charge numbers are E-

03/21-52799 and 28E-2021-00430C. The allegations contained in the charge are incorporated, by reference, as if more fully set forth herein.

33. On September 16, 2021, the EEOC issued a notice of Right to Sue.

34. This action is timely commenced, as it has been filed within 90 days of the issuance of the afore-mentioned Notice of Right to Sue. Thus, the Plaintiff has duly met all administrative requirements.

35. The actions of Defendant Sam's and its agents and employees were willful and malicious, the result of evil motive, or in reckless indifference to the Plaintiff's rights. Thus, Plaintiff is entitled to punitive damages, as determined by a jury.

**COUNT I. AGE DISCRIMINATION (DEFENDANT SAM'S)**

36. Plaintiff incorporates all the preceding paragraphs and allegations by reference as if more fully set forth herein.

37. At all times relevant to this matter, Plaintiff was over 40 years of age.

38. Plaintiff, while employed by the Sam's, was the subject of adverse action and discrimination by Sam's, on the basis of age, on a continuous basis, from August, 2021, until his termination.

39. The Sam's acts of discrimination include, but are not limited to, one or more of the following:

- a. Making inappropriate comments to the Plaintiff, relating to his age.
- b. Harassing Plaintiff because of his age.
- c. Reprimanding the Plaintiff, but not reprimanding other similarly situated employees, because of the Plaintiff's age.
- d. Terminating the Plaintiff, because of his age.

40. As a direct and proximate cause of the actions and conduct set forth herein, because of her age, Plaintiff is now suffering and will continue to suffer damages, including lost wages and benefits, emotional distress, pain and suffering, inconvenience, and loss of enjoyment of life.

41. Plaintiff's damages exceed \$25,000.00.

WHEREFORE, Plaintiff prays for judgment against Defendant Sam's on Count I of his Petition, for all actual damages and losses shown in evidence, and determined by a jury to be reasonable and fair, including, but not limited to: an award of back pay, including lost fringe benefits, bonuses, and cost of living increases; an award of front pay; for any other compensatory damages; for pre-judgment interest; for punitive damages, attorneys' fees, and all other damages, expenses, and costs incurred, and for other relief as the Court deems proper and just.

**COUNT II. RACE AND COLOR DISCRIMINATION (DEFENDANT SAM'S)**

42. Plaintiff incorporates all the preceding paragraphs and allegations by reference as if more fully set forth herein.

43. Plaintiff has brown skin and is of Middle Eastern descent.

44. Plaintiff, while employed by the Defendant Sam's, was the subject of adverse action and discrimination by Defendant Sam's, on the basis of race/color, on a continuous basis, from August, 2021, until his termination.

45. The Defendant Sam's acts of discrimination include, but are not limited to, one or more of the following:

- a. Making inappropriate comments to the Plaintiff, relating to race/color, that were not made to a similarly situated white employee.

- b. Placing the Plaintiff in a position where performing his job would be more difficult, and placing him in such a position because of race color.
- c. Reprimanding the Plaintiff, because of race/color, but not reprimanding other similarly situated white employees.
- d. Terminating the Plaintiff, because of race and color, but not terminating similarly situated white employees.

46. As a direct and proximate cause of the actions and conduct set forth herein, because of his race and color, Plaintiff is now suffering and will continue to suffer damages, including lost wages and benefits, emotional distress, pain and suffering, inconvenience, and loss of enjoyment of life.

47. Plaintiff's damages exceed \$25,000.00.

WHEREFORE, Plaintiff prays for judgment against Defendant Sam's on Count II of his Petition, for all actual damages and losses shown in evidence, and determined by a jury to be reasonable and fair, including, but not limited to: an award of back pay, including lost fringe benefits, bonuses, and cost of living increases; an award of front pay; for any other compensatory damages; for pre-judgment interest; for punitive damages, attorneys' fees, and all other damages, expenses, and costs incurred, and for other relief as the Court deems proper and just.

### **COUNT III. DISABILITY DISCRIMINATION (DEFENDANT SAM'S)**

48. Plaintiff incorporates all the preceding paragraphs and allegations by reference as if more fully set forth herein.

49. Plaintiff and his wife were perceived to have been disabled, and while she was sick Plaintiff's wife was disabled.



50. Plaintiff, while employed by the Defendant Sam's, was the subject of adverse action and discrimination by Defendant Sam's on the basis of perceived disability, as well as having a disabled relative, on a continuous basis, from August, 2021, until his termination.

51. The Defendant Sam's acts of discrimination include, but are not limited to, one or more of the following:

- a. Making inappropriate comments to the Plaintiff, relating to disability, that would not have otherwise been made.
- b. Placing the Plaintiff in a position where performing his job would be more difficult, because of disability.
- c. Reprimanding the Plaintiff, because of disability.
- d. Terminating the Plaintiff, because of disability.

52. As a direct and proximate cause of the actions and conduct set forth herein, because of disability, Plaintiff is now suffering and will continue to suffer damages, including lost wages and benefits, emotional distress, pain and suffering, inconvenience, and loss of enjoyment of life.

53. Plaintiff's damages exceed \$25,000.00.

WHEREFORE, Plaintiff prays for judgment against Defendant on Count III of his Petition, for all actual damages and losses shown in evidence, and determined by a jury to be reasonable and fair, including, but not limited to: an award of back pay, including lost fringe benefits, bonuses, and cost of living increases; an award of front pay; for any other compensatory damages; for pre-judgment interest; for punitive damages, attorneys' fees, and all other damages, expenses, and costs incurred, and for other relief as the

Court deems proper and just.

**COUNT IV. NATIONAL ORIGIN DISCRIMINATION (DEFENDANT SAM'S**

54. Plaintiff incorporates all the preceding paragraphs and allegations by reference as if more fully set forth herein.

55. Plaintiff has brown skin and is of Middle Eastern descent. He was born in Iran.

56. Plaintiff, while employed by the Defendant Sam's, was the subject of adverse action and discrimination by Defendant Sam's, on the basis of national origin, on a continuous basis, from August, 2021, until his termination.

57. The Defendant Sam's acts of discrimination include, but are not limited to, one or more of the following:

- a. Making inappropriate comments to the Plaintiff, relating to national origin, that were not made to a similarly situated white employee.
- b. Placing the Plaintiff in a position where performing his job would be more difficult, and placing him in such a position because of national origin.
- c. Reprimanding the Plaintiff, because of national origin, but not reprimanding other similarly situated white employees.
- d. Terminating the Plaintiff, because of national origin, but not terminating similarly situated white employees.

58. As a direct and proximate cause of the actions and conduct set forth herein, because of his national origin, Plaintiff is now suffering and will continue to suffer damages, including lost wages and benefits, emotional distress, pain and suffering,

inconvenience, and loss of enjoyment of life.

59. Plaintiff's damages exceed \$25,000.00.

WHEREFORE, Plaintiff prays for judgment against Defendant Sam's on Count IV of his Petition, for all actual damages and losses shown in evidence, and determined by a jury to be reasonable and fair, including, but not limited to: an award of back pay, including lost fringe benefits, bonuses, and cost of living increases; an award of front pay; for any other compensatory damages; for pre-judgment interest; for punitive damages, attorneys' fees, and all other damages, expenses, and costs incurred, and for other relief as the Court deems proper and just.

**COUNT V. VIOLATION OF MISSOURI SERVICE LETTER LAW (DEFENDANT SAM'S)**

60. Plaintiff incorporates each and every preceding paragraph of this Petition as if more fully set forth herein.

61. Plaintiff properly requested a letter of dismissal or "service letter", from Defendant Sam's, pursuant to RSMo. 290.140.

62. Defendant Sam's is an employer covered within 290.140.

63. Plaintiff is an employee entitled to request a service letter, pursuant to RSMo. 290.140, in that he was employed for at least 90 days prior to his discharge.

64. Defendant Sam's failed to issue a proper and compliant service letter, in that it did not send a service letter at all.

65. Defendant Sam's has acted in reckless disregard of Plaintiff's rights and/or with evil motive, justifying an award of punitive damages.

WHEREFORE, Plaintiff prays for judgment against Defendant Sam's on Count V

of his Petition, for all actual damages and losses shown in evidence, and determined by a jury to be reasonable and fair, including punitive damages.

**COUNT VI. SLANDER AND DEFAMATION (DEFENDANT COKELEY)**

66. Plaintiff re-alleges and incorporates herein by reference, as though fully set forth herein, all of the above numbered paragraphs.

67. In complaining to the Board of Pharmacy, Defendant Cokeley, with reckless disregard for the truth, published false and incorrect statements about Plaintiff to others, including to Defendant Sam's and the Board of Pharmacy.

68. These statements were made outside the scope of his employment with Defendant Sam's, and not a part of his job duties. Specifically, Cokeley stated that Plaintiff failed to, among other things, properly abide by the screening process.

69. Cokeley knew or with reasonable care could have discovered these statements to be false or materially misleading.

70. The statements were defamatory and affected and damaged Plaintiff's reputation in business and his integrity, and also had the stigma of falsely accusing him of a professional violation.

71. The statements were published with the requisite degree of fault, which is negligence, as Plaintiff is a private figure.

72. The statements resulted in actual damage to Plaintiff, including termination, a delay or denial of his unemployment benefits, and further, limited his opportunities to obtain employment following his termination.

73. Defendant Cokeley acted with reckless disregard of Plaintiff's rights and/or evil motive, justifying an award of punitive damages.

74. Cokeley performed these actions outside and beyond the scope of his employment with Sam's.

75. As a direct and proximate result of Cokeley's actions Plaintiff has sustained and continues to sustain damages.

WHEREFORE, Plaintiff prays for judgment against Defendant Cokeley, on Count VI of his Petition, for damages incurred, as determined by a jury; for punitive damages, and all other damages, expenses, and costs incurred, and for other relief as the Court deems proper and just.

**COUNT VII. TORTIOUS INTERFERENCE (DEFENDANT COKELEY)**

76. Plaintiff hereby incorporates the preceding paragraphs as though fully set forth herein.

77. Plaintiff and Defendant Sam's entered into a contract for services in which he would work for Sam's, in return for money.

78. Defendant Cokeley had reason to know that Plaintiff was employed by Sam's.

79. Defendant Cokeley, by making improper accusations to the Board of Pharmacy, caused a breach in the contractual relationship between Plaintiff and Sam's.

80. There was no cause or justification for the conduct of Defendant Cokeley.

81. As a result of the tortious interference of Defendant Cokeley, Plaintiff suffered, and will continue to suffer damages.

WHEREFORE, the Plaintiff requests the Court to enter a judgment against Defendants Cokeley on Count VII of the Petition, in excess of \$25,000.00, for his past and future lost income and revenue, for costs, and for such other and further relief as the

Court may deem just and equitable.

**DEMAND FOR A JURY TRIAL**

Plaintiffs hereby demand a trial by jury on all counts and claims in this cause of action.

Respectfully submitted,

**THE LAW OFFICE OF PHILLIP M. MURPHY II**

/s/ Phillip M. Murphy II  
PHILLIP M. MURPHY II #61467  
4717 Grand Ave., Ste. 300  
Kansas City, MO 64112  
(p) 913-661-2900 (f) 913-312-5841  
E-mail: phillip@phillipmurphylaw.com  
**ATTORNEYS FOR PLAINTIFFS**

MOHAMMAD KHOSHNEVISZADEH,	)	
	)	Case No.
Plaintiff,	)	Division
	)	
v.	)	
	)	
SAM’S WEST, INC.,	)	
	)	
And	)	
	)	
KEVIN COKELEY,	)	
Defendants.	)	

Case 4:22-cv-00012-RK Document 1-2 Filed 01/10/22 Page 15 of 34

Laura Skinner PPS21-0080  
Thomas Skinner PPS21-0081  
Richard Skyles PPS21-0082  
Anthony Spada PPS21-0083  
John Stotler PPS21-0220  
Randy Stone PPS21-0219  
Sonja Stone PPS21-0218

Lucas Traugott PPS21-0223  
Ryan Weekley PPS21-0084  
Misty Wege PPS21-0230  
Andrew Wheeler PPS21-0085  
Pamela Wheatley PPS21-0086  
Andrew Wickliffe PPS21-0087  
Gregory Willing PPS21-0088

Conni Wilson PPS21-0089  
Stan Yoder PPS21-0233  
Jacqueline Young PPS21-0090  
Greg Zotta PPS21-0091

who are qualified persons to serve process, are not parties to the case and are not less than eighteen (18) years of age, as private process servers in the above cause to serve process in this case.

By: \_\_\_\_\_

**ORDER**

It is hereby ordered that the Plaintiff's Motion for Approval and Appointment of private process server is granted and the above-named individuals are hereby approved and appointed to serve process in the above-captioned matter.

Date: \_\_\_\_\_  
\_\_\_\_\_  
Judge or Clerk

Respectfully submitted,

**THE LAW OFFICE OF PHILLIP M. MURPHY II**

\_\_\_\_\_  
/s/ Phillip M. Murphy II  
PHILLIP M. MURPHY II #61467  
4717 Grand Ave., Ste. 300  
Kansas City, MO 64112  
Phone: (913) 661-2900  
Fax: (913) 312-5841  
E-mail: [phillip@phillipmurphylaw.com](mailto:phillip@phillipmurphylaw.com)  
**ATTORNEY FOR PLAINTIFFS**





**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

<b>MOHAMMAD KHOSHNEVISZADEH,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No.</b>
	)	<b>Division</b>
<b>v.</b>	)	
	)	
<b>SAM'S WEST, INC.,</b>	)	
	)	
<b>And</b>	)	
	)	
<b>KEVIN COKELEY,</b>	)	
<b>Defendants.</b>	)	

**REQUEST FOR SERVICE**

To: Clerk of the Court

Please issue an alias summons for Kevin Cokeley, for service in person at 1000 Carondelet, Kansas City, Missouri, via private process.

Respectfully Submitted,

\_\_\_\_\_  
/s/ Phillip M. Murphy II  
PHILLIP M. MURPHY II #61467  
4717 Grand Ave., Ste. 300  
Kansas City, MO 64112  
Phone: (913) 661-2900  
Fax: (913) 312-5841  
E-mail: phillip@phillipmurphylaw.com  
**ATTORNEYS FOR PLAINTIFFS**

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

**MOHAMMAD KHOSHNEVISZADEH,**

**PLAINTIFF(S),  
VS.**

**CASE NO. 2116-CV25207  
DIVISION 12**

**SAM'S WEST, INC.,**

**DEFENDANT(S).**

**NOTICE OF CASE MANAGEMENT CONFERENCE FOR CIVIL CASE  
AND ORDER FOR MEDIATION**

---

NOTICE IS HEREBY GIVEN that a Case Management Conference will be held with the Honorable **JENNIFER PHILLIPS** on **07-MAR-2022** in **DIVISION 12** at **09:30 AM**. All Applications for Continuance of a Case Management Conference should be filed on or before Wednesday of the week prior to the case management setting. Applications for Continuance of a Case Management Conference shall comply with Supreme Court Rule and 16<sup>th</sup> Cir. R. 34.1. Continuance of a Case Management Conference will only be granted for good cause shown because it is the desire of the Court to meet with counsel and parties in all cases within the first 4 months that a case has been on file. All counsel and parties are directed to check Case.NET on the 16<sup>th</sup> Judicial Circuit web site at [www.16thcircuit.org](http://www.16thcircuit.org) after filing an application for continuance to determine whether or not it has been granted.

A lead attorney of record must be designated for each party as required by Local Rule 3.5.1. A separate pleading designating the lead attorney of record shall be filed by each party as described in Local Rule 3.5.2. The parties are advised that if they do not file a separate pleading designating lead counsel, even in situations where there is only one attorney representing the party, JIS will not be updated by civil records department, and copies of orders will be sent to the address currently shown in JIS. Civil Records does not update attorney information from answers or other pleadings. The Designation of Lead Attorney pleading shall contain the name of lead counsel, firm name, mailing address, phone number, FAX number and E-mail address of the attorney who is lead counsel.

At the Case Management Conference, counsel should be prepared to address at least the following:

- a. A trial setting;
- b. Expert Witness Disclosure Cutoff Date;
- c. A schedule for the orderly preparation of the case for trial;
- d. Any issues which require input or action by the Court;
- e. The status of settlement negotiations.

### **MEDIATION**

The parties are ordered to participate in mediation pursuant to Supreme Court Rule 17. Mediation shall be completed within 10 months after the date the case is filed for complex cases, and 6 months after the date the case is filed for other circuit cases, unless otherwise ordered by the Court. Each party shall personally appear at the mediation and participate in the process. In the event a party does not have the authority to enter into a settlement, then a representative of the entity that does have actual authority to enter into a settlement on behalf of the party shall also personally attend the mediations with the party.

The parties shall confer and select a mutually agreeable person to act as mediator in this case. If the parties are unable to agree on a mediator the court will appoint a mediator at the Case Management Conference.

Each party shall pay their respective pro-rata cost of the mediation directly to the mediator.

### **POLICIES/PROCEDURES**

Please refer to the Court's web page [www.16thcircuit.org](http://www.16thcircuit.org) for division policies and procedural information listed by each judge.

**/S/ JENNIFER PHILLIPS**

**JENNIFER PHILLIPS, Circuit Judge**

### **Certificate of Service**

This is to certify that a copy of the foregoing was electronic noticed, faxed, emailed and/or mailed or hand delivered to the plaintiff with the delivery of the file-stamped copy of the petition. It is further certified that a copy of the foregoing will be served with the summons on each defendant named in this action.

#### **Attorney for Plaintiff(s):**

PHILLIP M. MURPHY, 4717 GRAND AVENUE, SUITE 250, KANSAS CITY, MO 64112

#### **Defendant(s):**

SAM'S WEST, INC.  
KEVIN COKELEY

Dated: 18-NOV-2021

MARY A. MARQUEZ  
Court Administrator

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

<b>MOHAMMAD KHOSHNEVISZADEH,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No.</b>
	)	<b>Division</b>
<b>v.</b>	)	
	)	
<b>SAM'S WEST, INC.,</b>	)	
	)	
<b>And</b>	)	
	)	
<b>KEVIN COKELEY,</b>	)	
<b>Defendants.</b>	)	

**MOTION FOR APPROVAL AND APPOINTMENT OF PRIVATE PROCESS SERVER**

COMES NOW Plaintiff, by and through its attorney of record, and for its Motion for Approval/Appoint of Private Process Server, and requests that D&B Legal Services, Inc.: Legal Names (s):

Jamie Andrews PPS21-0022	David Garza PPS21-0134	Heather Merfen PPS21-0060
Sallie Bailey PPS21-0023	Bradley Gordon PPS21-0038	Thomas Melte PPS21-0061
Brian Bankowski PPS21-0099	Thomas Gorgen PPS21-0039	Jill Miller PPS21-0178
Dustin Becraft PPS21-0024	Mason Gray PPS21-0140	Michael Miller PPS21-0062
Carrington Bell PPS21-0025	Charles Gunning PPS21-0040	Matthew Millhollin PPS21-0063
Miranda Bergner PPS21-0101	Michael Hancock PPS21-0041	Jason Moody PPS21-0064
Steven Bergner PPS21-0026	James Hannah PPS21-0042	Jeremy Nicholas PPS21-0065
Thomas Bogue PPS21-0027	Rufus Harmon PPS21-0043	Michael Noble PPS21-0066
Mathew Bohrer PPS21-0103	Stephen Heitz PPS21-0044	Greg Noll PPS21-0067
Arthur Boyer PPS21-0028	James Hise PPS21-0045	Robert Peters PPS21-0193
Scott Brady PPS21-0029	William Hockersmith PPS21-0046	Carrie Pfeifer PPS21-0068
Donald Branda PPS21-0104	Mike Johnson PPS21-0047	Craig Poese PPS21-0069
Jeff Brown PPS21-0030	Tawanda Johnson PPS21-0048	Dee Powell PPS21-0070
Randy Burrow PPS21-0107	Patrick Jones PPS21-0049	Samantha Powell PPS21-0071
Gary Burt PPS21-0031	Wendy Hilgenberg PPS21-0050	William Powell PPS21-0072
Glen Cobb PPS21-0114	Brent Kirkhart PPS21-0051	Kim Presler PPS21-0073
Norman Collins PPS21-0115	Janice Kirkhart PPS21-0052	Marcus Presler PPS21-0074
Michael Conklin PPS21-0120	Tyler Kirkhart PPS21-0053	Mark Rauss PPS21-0075
Lisa Corbett PPS21-0122	Raymond Land PPS21-0162	Jason Rodgers PPS21-0076
David Dice PPS21-0032	Bert Lott PPS21-0054	Richard Roth PPS21-0077
Maureen Dice PPS21-0033	Frank Lundien PPS21-0168	Edna Russell PPS21-0078
Norman Diggs PPS21-0125	Chad Maier PPS21-0170	Juan Santos PPS21-0207
Edwina Ditmore PPS21-0126	Kenneth Marshall PPS21-0171	Brian Scheer PPS21-0208
William Ferrell PPS21-0034	Deborah Martin PPS21-0055	Brenda Schiwitz PPS21-0079
Robert Finley PPS21-0035	Michael Martin PPS21-0056	Mark Schneider PPS21-0209
Ramona Foster PPS21-0132	Timothy McLleary PPS21-0057	Joe Sherrod PPS21-0212
James Frago PPS21-0036	Michael Meador PPS21-0058	Michael Siegel PPS21-0213
John Frago PPS21-0037	Maria Meier PPS21-0059	Robert Simpson PPS21-0214

Laura Skinner PPS21-0080  
Thomas Skinner PPS21-0081  
Richard Skyles PPS21-0082  
Anthony Spada PPS21-0083  
John Stotler PPS21-0220  
Randy Stone PPS21-0219  
Sonja Stone PPS21-0218

Lucas Traugott PPS21-0223  
Ryan Weekley PPS21-0084  
Misty Wege PPS21-0230  
Andrew Wheeler PPS21-0085  
Pamela Wheelley PPS21-0086  
Andrew Wickliffe PPS21-0087  
Gregory Willing PPS21-0088

Conni Wilson PPS21-0089  
Stan Yoder PPS21-0233  
Jacqueline Young PPS21-0090  
Greg Zotta PPS21-0091

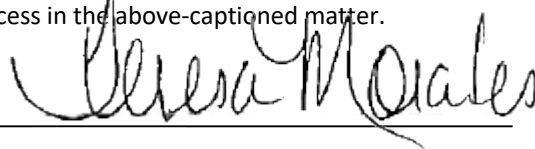
who are qualified persons to serve process, are not parties to the case and are not less than eighteen (18) years of age, as private process servers in the above cause to serve process in this case.

By: \_\_\_\_\_

**ORDER**

It is hereby ordered that the Plaintiff's Motion for Approval and Appointment of private process server is granted and the above-named individuals are hereby approved and appointed to serve process in the above-captioned matter.

Date: 18-Nov-2021



DEPUTY COURT ADMINISTRATOR

Respectfully submitted,

**THE LAW OFFICE OF PHILLIP M. MURPHY II**

/s/ Phillip M. Murphy II  
PHILLIP M. MURPHY II #61467  
4717 Grand Ave., Ste. 300  
Kansas City, MO 64112  
Phone: (913) 661-2900  
Fax: (913) 312-5841  
E-mail: [phillip@phillipmurphyllaw.com](mailto:phillip@phillipmurphyllaw.com)  
**ATTORNEY FOR PLAINTIFFS**




# IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JENNIFER PHILLIPS	Case Number: 2116-CV25207
Plaintiff/Petitioner: MOHAMMAD KHOSHNEVISZADEH	Plaintiff's/Petitioner's Attorney/Address PHILLIP M. MURPHY II 4717 GRAND AVENUE SUITE 250 KANSAS CITY, MO 64112
Defendant/Respondent: SAM'S WEST, INC.	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Employmnt Discrmntn 213.111	

(Date File Stamp)

## Summons in Civil Case

<p><b>The State of Missouri to:</b> SAM'S WEST, INC. <b>Alias:</b> 4100 SOUTH BOLGER ROAD INDEPENDENCE, MO 64055</p>	<h1>PRIVATE PROCESS SERVER</h1>
<p><b>COURT SEAL OF</b>  <b>JACKSON COUNTY</b></p>	<p><b>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</b></p> <p>18-NOV-2021 Date</p> <p>Further Information:</p>

### Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
- ☐ other \_\_\_\_\_.

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public

### Sheriff's Fees

Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Sheriff's Deputy Salary  
Supplemental Surcharge \$ 10.00  
Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)  
**Total** \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

## **SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION**

Under the Missouri e-filing system now utilized by the 16<sup>th</sup> Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

[16thcircuit.org](http://16thcircuit.org) → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County






# IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JENNIFER PHILLIPS	Case Number: 2116-CV25207
Plaintiff/Petitioner: MOHAMMAD KHOSHNEVISZADEH	Plaintiff's/Petitioner's Attorney/Address PHILLIP M. MURPHY II 4717 GRAND AVENUE SUITE 250 KANSAS CITY, MO 64112
Defendant/Respondent: SAM'S WEST, INC.	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Employmnt Discrmntn 213.111	

(Date File Stamp)

## Summons in Civil Case

<b>The State of Missouri to: KEVIN COKELEY</b> Alias: 1000 CARONDELET KANSAS CITY, MO 64114	<b>PRIVATE PROCESS SERVER</b>
 <p><b>COURT SEAL OF</b>  <b>JACKSON COUNTY</b></p>	<p><b>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</b></p> <p>18-NOV-2021 Date</p> <p>Further Information:</p>

### Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
- ☐ other \_\_\_\_\_.

Served at \_\_\_\_\_ (address)  
 in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public

### Sheriff's Fees

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Sheriff's Deputy Salary  
 Supplemental Surcharge \$ 10.00  
 Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)  
**Total** \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

## **SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION**

Under the Missouri e-filing system now utilized by the 16<sup>th</sup> Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County

**AFFIDAVIT OF SERVICE**

**State of Missouri**

**County of INDEPENDENCE**

**Circuit Court**

Case Number: 2116-CV25207

Plaintiff:  
**MOHAMMAD KHOSHNEVISZADEH**

vs.

Defendant:  
**SAM'S WEST INC AND KEVIN COKELEY**

For:  
PHILLIP M MURPHY II  
4717 GRAND AVENUE  
SUITE 250  
KANSAS CITY, MO 64112



POW2021011245

Received by D & B Legal Services, Inc. on the 19th day of November, 2021 at 10:27 am to be served on **KEVIN COKELEY, ST JOSEPH MEDICAL CENTER, 1000 CARONDELET, KANSAS CITY, MO 64114.**

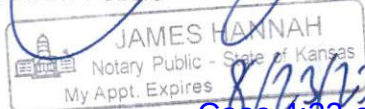
I, Alisha Allen PPS21-0094, being duly sworn, depose and say that on the **9th day of December, 2021 at 11:56 am, I:**

**INDIVIDUALLY/PERSONALLY** served by delivering a true copy of the **Summons in Civil Case, Petition For Damages and Motion for Approval and Appointment of Private Process Server** with the date and hour of service endorsed thereon by me, to: **KEVIN COKELEY** at the alternate address of: **826 S MAIN ST, LIBERTY, MO 64068.**

I certify that I am over the age of 18 and have no interest in the above action and the foregoing statements made by me are true and correct.

Subscribed and Sworn to before me on the 13th day of  
December, 2021

NOTARY PUBLIC



**Alisha Allen PPS21-0094**  
Process Server

**D & B Legal Services, Inc.**  
**P.O. Box 7471**  
**Overland Park, KS 66207**  
**(913) 362-8110**

Our Job Serial Number: POW-2021011245



# IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JENNIFER PHILLIPS	Case Number: 2116-CV25207
Plaintiff/Petitioner: MOHAMMAD KHOSHNEVISZADEH	Plaintiff's/Petitioner's Attorney/Address PHILLIP M. MURPHY II 4717 GRAND AVENUE SUITE 250 KANSAS CITY, MO 64112
Defendant/Respondent: SAM'S WEST, INC.	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Employmnt Discrimtn 213.111	(Date File Stamp)

## Summons in Civil Case

<p>The State of Missouri to: KEVIN COKELEY Alias: 1000 CARONDELET KANSAS CITY, MO 64114</p> <p><b>COURT SEAL OF</b>  <b>JACKSON COUNTY</b></p>	<p><b>PRIVATE PROCESS SERVER</b></p> <p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p>18-NOV-2021 Date</p> <p>Further Information:</p> <p><i>[Signature]</i> Clerk</p>
<p><b>Sheriff's or Server's Return</b></p> <p>Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.</p> <p>I certify that I have served the above summons by: (check one)</p> <p><input type="checkbox"/> delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.</p> <p><input type="checkbox"/> leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.</p> <p><input type="checkbox"/> (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).</p> <p><input type="checkbox"/> other _____</p> <p>Served at _____ (address)</p> <p>in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).</p> <p>Printed Name of Sheriff or Server _____ Signature of Sheriff or Server _____</p> <p><b>Must be sworn before a notary public if not served by an authorized officer:</b></p> <p>(Seal) Subscribed and sworn to before me on _____ (date).</p> <p>My commission expires: _____ Date _____ Notary Public _____</p>	
<p><b>Sheriff's Fees</b></p> <p>Summons \$ _____</p> <p>Non Est \$ _____</p> <p>Sheriff's Deputy Salary \$ _____</p> <p>Supplemental Surcharge \$ 10.00</p> <p>Mileage \$ _____ (_____ miles @ \$_____ per mile)</p> <p>Total \$ _____</p> <p>A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.</p>	



**AFFIDAVIT OF SERVICE**

**State of Missouri**

**County of INDEPENDENCE**

**Circuit Court**

Case Number: 2116-CV25207

Plaintiff:  
**MOHAMMAD KHOSHNEVISZADEH**

vs.

Defendant:  
**SAM'S WEST INC AND KEVIN COKELEY**

For:  
PHILLIP M MURPHY II  
4717 GRAND AVENUE  
SUITE 250  
KANSAS CITY, MO 64112



POW2021011245

Received by D & B Legal Services, Inc. on the 19th day of November, 2021 at 10:27 am to be served on **KEVIN COKELEY, ST JOSEPH MEDICAL CENTER, 1000 CARONDELET, KANSAS CITY, MO 64114.**

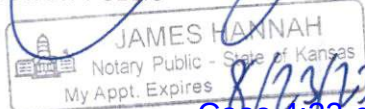
I, Alisha Allen PPS21-0094, being duly sworn, depose and say that on the **9th day of December, 2021 at 11:56 am, I:**

**INDIVIDUALLY/PERSONALLY** served by delivering a true copy of the **Summons in Civil Case, Petition For Damages and Motion for Approval and Appointment of Private Process Server** with the date and hour of service endorsed thereon by me, to: **KEVIN COKELEY** at the alternate address of: **826 S MAIN ST, LIBERTY, MO 64068.**

I certify that I am over the age of 18 and have no interest in the above action and the foregoing statements made by me are true and correct.

Subscribed and Sworn to before me on the 13th day of December, 2021

NOTARY PUBLIC



**Alisha Allen PPS21-0094**  
Process Server

**D & B Legal Services, Inc.**  
**P.O. Box 7471**  
**Overland Park, KS 66207**  
**(913) 362-8110**

Our Job Serial Number: POW-2021011245



# IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JENNIFER PHILLIPS	Case Number: 2116-CV25207
Plaintiff/Petitioner: MOHAMMAD KHOSHNEVISZADEH	Plaintiff's/Petitioner's Attorney/Address PHILLIP M. MURPHY II 4717 GRAND AVENUE SUITE 250 KANSAS CITY, MO 64112
Defendant/Respondent: SAM'S WEST, INC.	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Employmnt Discrimtn 213.111	(Date File Stamp)

## Summons in Civil Case

<p>The State of Missouri to: KEVIN COKELEY Alias: 1000 CARONDELET KANSAS CITY, MO 64114</p>	<h2>PRIVATE PROCESS SERVER</h2>
<p><b>COURT SEAL OF</b>  <b>JACKSON COUNTY</b></p>	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p>18-NOV-2021 Date</p> <p>Further Information:</p>
<p><b>Sheriff's or Server's Return</b></p> <p>Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.</p> <p>I certify that I have served the above summons by: (check one)</p> <p><input type="checkbox"/> delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.</p> <p><input type="checkbox"/> leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.</p> <p><input type="checkbox"/> (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).</p> <p><input type="checkbox"/> other _____</p> <p>Served at _____ (address)</p> <p>in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).</p> <p>Printed Name of Sheriff or Server _____ Signature of Sheriff or Server _____</p> <p><b>Must be sworn before a notary public if not served by an authorized officer:</b></p> <p>(Seal) Subscribed and sworn to before me on _____ (date).</p> <p>My commission expires: _____ Date _____ Notary Public _____</p>	
<p><b>Sheriff's Fees</b></p> <p>Summons \$ _____</p> <p>Non Est \$ _____</p> <p>Sheriff's Deputy Salary \$ _____</p> <p>Supplemental Surcharge \$ 10.00</p> <p>Mileage \$ _____ (_____ miles @ \$_____ per mile)</p> <p>Total \$ _____</p> <p>A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.</p>	

**AFFIDAVIT OF SERVICE**

State of Missouri

County of INDEPENDENCE

Circuit Court

Case Number: 2116-CV25207

Plaintiff:  
**MOHAMMAD KHOSHNEVISZADEH**

vs.

Defendant:  
**SAM'S WEST INC AND KEVIN COKELY**

For:  
PHILLIP M MURPHY II  
4717 GRAND AVENUE  
SUITE 250  
KANSAS CITY, MO 64112



POW2021011246

Received by D & B Legal Services, Inc. on the 19th day of November, 2021 at 10:27 am to be served on **SAM'S WEST INC, 4100 SOUTH BOLGER ROAD, INDEPENDENCE, MO 64055.**

I, Andrew Wickliffe PPS21-0087, being duly sworn, depose and say that on the **14th day of December, 2021 at 1:44 pm, I:**

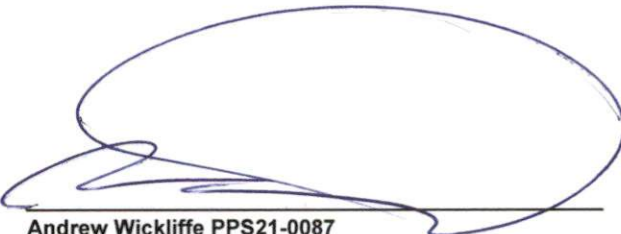
served a **CORPORATION** by delivering a true copy of the **Summons in Civil Case, Petition For Damages and Motion for Approval and Appointment of Private Process Server** with the date and hour of service endorsed thereon by me, to: **ZAC LINGENFELTER** as **AUTHORIZED AGENT** for **SAM'S WEST INC**, at the address of: **4100 SOUTH BOLGER ROAD, INDEPENDENCE, MO 64055.**

I certify that I am over the age of 18 and have no interest in the above action and the foregoing statements made by me are true and correct.

Subscribed and Sworn to before me on the 15th day of  
December, 2021

NOTARY PUBLIC



  
**Andrew Wickliffe PPS21-0087**  
Process Server

**D & B Legal Services, Inc.**  
**P.O. Box 7471**  
**Overland Park, KS 66207**  
**(913) 362-8110**

Our Job Serial Number: POW-2021011246





# IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JENNIFER PHILLIPS	Case Number: 2116-CV25207
Plaintiff/Petitioner: MOHAMMAD KHOSHNEVISZADEH	Plaintiff's/Petitioner's Attorney/Address PHILLIP M. MURPHY II 4717 GRAND AVENUE SUITE 250 KANSAS CITY, MO 64112
Defendant/Respondent: SAM'S WEST, INC.	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Employmnt Discrmntn 213.111	

(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: SAM'S WEST, INC.  
Alias:

4100 SOUTH BOLGER ROAD  
INDEPENDENCE, MO 64055

## PRIVATE PROCESS SERVER

COURT SEAL OF



JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

18-NOV-2021  
Date

Further Information:

*[Signature]*  
Clerk

### Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

\_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

(Seal)

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires:

Date

Notary Public

### Sheriff's Fees

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ 10.00

Supplemental Surcharge \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$\_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



**AFFIDAVIT OF SERVICE**

State of Missouri

County of INDEPENDENCE

Circuit Court

Case Number: 2116-CV25207

Plaintiff:  
**MOHAMMAD KHOSHNEVISZADEH**

vs.

Defendant:  
**SAM'S WEST INC AND KEVIN COKELY**

For:  
PHILLIP M MURPHY II  
4717 GRAND AVENUE  
SUITE 250  
KANSAS CITY, MO 64112



POW2021011246

Received by D & B Legal Services, Inc. on the 19th day of November, 2021 at 10:27 am to be served on **SAM'S WEST INC, 4100 SOUTH BOLGER ROAD, INDEPENDENCE, MO 64055.**

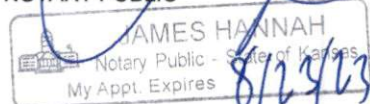
I, Andrew Wickliffe PPS21-0087, being duly sworn, depose and say that on the **14th day of December, 2021 at 1:44 pm, I:**

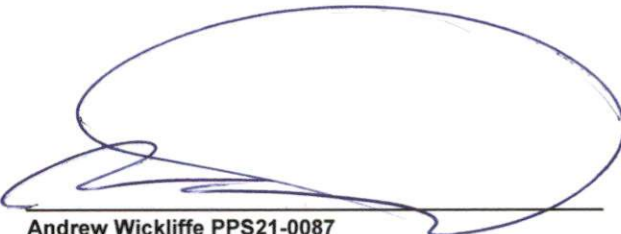
served a **CORPORATION** by delivering a true copy of the **Summons in Civil Case, Petition For Damages and Motion for Approval and Appointment of Private Process Server** with the date and hour of service endorsed thereon by me, to: **ZAC LINGENFELTER** as **AUTHORIZED AGENT** for **SAM'S WEST INC**, at the address of: **4100 SOUTH BOLGER ROAD, INDEPENDENCE, MO 64055.**

I certify that I am over the age of 18 and have no interest in the above action and the foregoing statements made by me are true and correct.

Subscribed and Sworn to before me on the 15th day of December, 2021

NOTARY PUBLIC



  
**Andrew Wickliffe PPS21-0087**  
Process Server

**D & B Legal Services, Inc.**  
**P.O. Box 7471**  
**Overland Park, KS 66207**  
**(913) 362-8110**

Our Job Serial Number: POW-2021011246



# IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JENNIFER PHILLIPS	Case Number: 2116-CV25207
Plaintiff/Petitioner: MOHAMMAD KHOSHNEVISZADEH	Plaintiff's/Petitioner's Attorney/Address PHILLIP M. MURPHY II 4717 GRAND AVENUE SUITE 250 KANSAS CITY, MO 64112
Defendant/Respondent: SAM'S WEST, INC.	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Employmnt Discrmntn 213.111	

(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: SAM'S WEST, INC.  
Alias:

4100 SOUTH BOLGER ROAD  
INDEPENDENCE, MO 64055

## PRIVATE PROCESS SERVER

COURT SEAL OF



JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

18-NOV-2021

Date

*[Signature]*  
Clerk

Further Information:

### Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

\_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires:

Date

Notary Public

### Sheriff's Fees

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$\_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.